

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Cr. No. 02-10113-RGS

|                              |   |                               |
|------------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA     | ) | VIOLETIONS:                   |
|                              | ) |                               |
| v.                           | ) | 21 U.S.C. § 846 -             |
|                              | ) | Conspiracy to Possess         |
| 1. DIOMEDES ANZIANI          | ) | Heroin with Intent            |
| 2. LUIS E. RODRIGUEZ         | ) | to Distribute                 |
| 3. JOSE MIGUEL HICIANO AMARO | ) |                               |
| 4. JOHNNY CIRIACO            | ) | 21 U.S.C. § 841-              |
| 5. RAMON ANZIANI             | ) | Possession of Heroin with     |
| 6. PEDRO MARTINEZ            | ) | Intent to Distribute and      |
| 7. ANGEL MATOS               | ) | Distribution of Heroin        |
| 8. ELISON ANZIANI            | ) |                               |
| 9. RAFAEL CORTIJO            | ) | 21 U.S.C. § 843(b) -          |
| 10. ARCHIE DESROSIERS        | ) | Use of Communication Facility |
| 11. ROBERT DAVIS             | ) | in Furtherance of a           |
| 12. RYAN CASSAVECHIA         | ) | Controlled Substances Offense |
| 13. CHRISTY WANAGER          | ) |                               |
| 14. CHRISTOPHER JOHNSON      | ) |                               |
| 15. ALANDA DOWNS             | ) | 18 U.S.C. § 2-Aiding and      |
| 16. MICHAEL BODGE            | ) | Abetting                      |
| 17. FRANK MCQUADE            | ) |                               |
| 18. SHANNAH VIGUE            | ) |                               |
| 19. MATTHEW STONE            | ) |                               |
| 20. MELANIO ALMONTE          | ) |                               |
| 21. JONATHAN GARCIA          | ) |                               |
| 22. CRISTIAN GARCIA          | ) |                               |
| 23. JUAN A. HERNANDEZ ORTIZ  | ) |                               |
| 24. FNU LNU,                 | ) |                               |
| a/k/a "Frenergy,"            | ) |                               |
| a/k/a "Frank"                | ) |                               |
| 25. DANIEL ORTIZ             | ) |                               |
| 26. FNU LNU,                 | ) |                               |
| a/k/a "Vitin"                | ) |                               |
| 27. FNU LNU,                 | ) |                               |
| a/k/a "Pineo"                | ) |                               |
| a/k/a "Yoel Rodriguez"       | ) |                               |
| 28. FNU LNU, a/k/a "Dario"   | ) |                               |
| a/k/a "Miguel Garcia"        | ) |                               |
| 29. WILLIAM FELIZ,           | ) |                               |
| a/k/a "William Felix"        | ) |                               |

**SECOND SUPERSEDING INDICTMENT**

**COUNT ONE: (21 U.S.C. § 846 - Conspiracy to Possess Heroin  
With Intent to Distribute and to Distribute  
Heroin)**

The Grand Jury charges that:

From a date unknown to the United States, but from at least May 16, 2001, and continuing thereafter until on or about April 2, 2002, in the District of Massachusetts,

3. JOSE MIGUEL HICIANO AMARO,  
4. JOHNNY CIRIACO,  
5. RAMON ANZIANI,  
7. ANGEL MATOS,  
9. RAFAEL CORTIJO,  
10. ARCHIE DESROSIERS,  
14. CHRISTOPHER JOHNSON,

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury to possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

It is further alleged that the defendants conspired to distribute, and to possess with intent to distribute, 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B).

**COUNT TWO: (21 U.S.C. § 846 - Conspiracy to Possess Heroin  
With Intent to Distribute and to Distribute  
Heroin)**

The Grand Jury further charges that:

From a date unknown to the United States, but from at least March 19, 2002, and continuing thereafter until on or about March 30, 2002, in the District of Massachusetts,

9. RAFAEL CORTIJO, and  
17. FRANK MCQUADE,

defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to the United States to possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

**COUNT THREE: (21 U.S.C. § 846 - Conspiracy to Possess Heroin  
With Intent to Distribute and to Distribute  
Heroin)**

The Grand Jury further charges that:

From a date unknown to the United States, but from at least  
December 19, 2001, and continuing thereafter until on or about  
March 22, 2002, in the District of Massachusetts,

- 3. JOSE MIGUEL HICIANO AMARO,
- 4. JOHNNY CIRIACO,
- 21. JONATHAN GARCIA,
- 24. FNU LNU,
  - a/k/a "Frenergy,"
  - a/k/a "Frank,"
- 27. FNU LNU,
  - a/k/a "Pineo,"
  - a/k/a "Yoel Rodriguez"
- 28. FNU LNU,
  - a/k/a "Dario,"
  - a/k/a "Miguel Garcia," and
- 29. WILLIAM FELIZ,
  - a/k/a "William Felix,"

defendants herein, did knowingly and intentionally combine,  
conspire, confederate and agree with other persons known and  
unknown to the United States to possess with intent to  
distribute, and to distribute, heroin, a Schedule I controlled  
substance, in violation of Title 21, United States Code, Section  
841(a)(1).

It is further alleged that the defendants conspired to  
distribute, and to possess with intent to distribute, 100 grams  
or more of a mixture or substance containing a detectable amount  
of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections

846 and 841(b)(1)(B).

**COUNT FOUR:**      **(21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute and Distribution of Heroin; 18 U.S.C. § 2 - Aiding and Abetting)**

The Grand Jury further charges that:

On or about July 10, 2001, in Methuen, in the District of Massachusetts, and elsewhere,

14. CHRISTOPHER JOHNSON,  
defendant herein, did knowingly and intentionally possess with intent to distribute, and distribute heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841 (a)(1) and Title 18, United States Code, Section 2.

**COUNT FIVE:**       **(21 U.S.C. § 841(a)(1) - Possession with Intent to Distribute and Distribution of Heroin; 18 U.S.C. § 2 - Aiding and Abetting)**

The Grand Jury further charges that:

On or about December 29, 2001, in Methuen, in the District of Massachusetts, and elsewhere

14. CHRISTOPHER JOHNSON, defendant herein, did knowingly and intentionally possess with intent to distribute, and distribute heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841 (a)(1) and Title 18, United States Code, Section 2.

**COUNT SIX: (21 U.S.C. § 843(b) - Use of a Communication Facility in Furtherance of a Controlled Substances Offense)**

The Grand Jury further charges that:


On or about March 26, 2002, in Essex County, in the District of Massachusetts, and elsewhere,

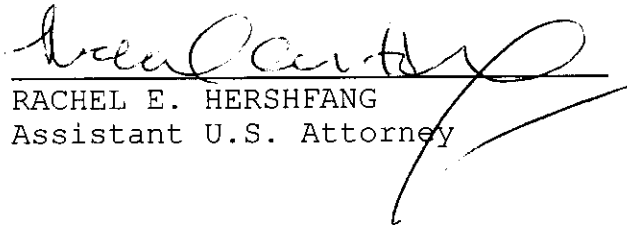
17. FRANK MCQUADE, defendant herein, did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Section 846, conspiracy to possess heroin with intent to distribute, and to distribute heroin.

All in violation of Title 21, United States Code, Section 843 (b).



A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

  
RACHEL E. HERSHFANG  
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS

May 13, 2004. @ 2:56 PM

Returned into the District Court by the Grand Jurors and filed.

  
Deputy Clerk